#### Case 7:25-cr-00060-PMH

# Document 34

### Filed 07/18/25

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Application granted. The status conference scheduled for July 21, 2025 is adjourned to September 18, 2025 at 10:00 a.m. By September 11, 2025, the parties shall advise the Court whether the status conference should be converted to a change of plea hearing. The Clerk of Court is respectfully directed to terminate the pending letter-motion (Doc. 33).

SO QRDERED.

Philip M. Halpern

United States District Judge

Dated: White Plains, New York

July 18, 2025

## **By ECF and EMAIL**

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Miguel Munoz, 25 Cr. 60 (PMH)

Dear Judge Halpern:

The Government respectfully requests that the Court adjourn the status conference scheduled for July 21, 2025, by approximately 45 days and exclude time to and through that date under the Speedy Trial Act, 18 U.S.C. § 3161.

On June 9, 2025, this Court scheduled a status conference for July 21, 2025, and excluded time through that date. On July 16, 2025, the Government transmitted a formal plea offer to defense counsel. The Government asks that the Court adjourn the status conference scheduled for July 21, 2025, by approximately 45 days so that defense counsel and the defendant may discuss and consider the Government's offer. The defendant consents to this request.

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In addition, the Government asks the Court to exclude time from July 21, 2025, to and through the next scheduled status conference. The defendant consents to this request. The Government makes this request pursuant to 18 U.S.C. § 3161(h)(7)(A) so that the parties can continue to discuss a potential pretrial disposition of this matter. The ends of justice served by the granting of the continuance requested outweigh the interests of the public and defendant in a speedy trial. A proposed order has been attached to this letter.

Respectfully submitted,

JAY CLAYTON United States Attorney

by: Jorja N. Knauer

Assistant United States Attorney

(914) 993-1919

cc: Elizabeth Quinn, Esq. (by ECF and Email)

SOUTHERN DISTRICT OF NEW			
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UNITED STATES OF AMERICA		:	[PROPOSED] ORDER
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		:	25 Cr. 60 (PMH)
MIGUEL MUNOZ,	:		
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	Defendant.	; - v	

Upon the application of the United States of America, by and through Jay Clayton, United States Attorney, Jorja N. Knauer, of counsel, and with consent from the defendant, by and through his counsel, it is hereby ORDERED that the time from July 21, 2025, through and including \_\_\_\_\_\_\_, the date of the next scheduled pretrial conference, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interests of justice.

The Court finds that the ends of justice served by granting the exclusion outweigh the best interests of the public and the defendant in a speedy trial, because it will permit the parties to continue discussing a potential disposition of this case without the need for trial.

Dated: White Plains, New York
\_\_\_\_\_, 2025

HON. PHILIP M. HALPERN

UNITED STATES DISTRICT JUDGE